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July 6, 2022

**VIA ECF**

The Honorable Vernon S. Broderick  
Judge of the Southern District of New York  
United States Courthouse  
500 Pearl Street  
New York NY 10007

**Re: Cocchia v. Project Renewal, Inc.,  
Case No.: 21-CV-10250 (VSB)**

Dear Judge Broderick:

This firm represents Defendants Project Renewal, Inc., PRI Villa Avenue Housing Development Fund Corporation, and PRI Villa Avenue, L.P. in connection with the above-referenced matter. We write jointly with Plaintiff's counsel to request that the deadlines in the discovery schedule that was entered on March 15, 2022 (ECF No. 27), which were held in abeyance for 60 days per Your Honor's March 17, 2022 Order (ECF No. 29) and again per Your Honor's May 4, 2022 Order (ECF No. 35), be held in abeyance for another 60 sixty days in order for the Parties to continue settlement negotiations.

In addition to the previously mentioned meeting on April 28, 2022, the Parties had an additional meeting on June 30, 2022 and have made significant progress towards pre-discovery resolution of this matter. The Parties are still committed to prioritizing early resolution instead of protracted discovery. Accordingly, the Parties propose the following discovery schedule:

	<b>Current Deadline:</b>	<b>Proposed Deadline:</b>
<b>End of Fact Discovery</b>	October 18, 2022	December 16, 2022
<b>Deadline to Serve Requests for Production</b>	July 15, 2022	September 13, 2022
<b>Deadline to Serve Interrogatories</b>	July 15, 2022	September 13, 2022
<b>Deadline to Complete Depositions</b>	September 30, 2022	November 29, 2022
<b>Deadline to Serve Requests for Admissions</b>	August 29, 2022	October 28, 2022
<b>End of Expert Discovery</b>	December 2, 2022	January 31, 2023
<b>End of All Discovery</b>	December 2, 2022	January 31, 2023

<b>Post Discovery Conference</b>	November 23, 2022	January 23, 2023
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Thank you for your consideration of this matter.

Respectfully submitted,

JACKSON LEWIS P.C.

/s/ *Richard J. Greenberg*

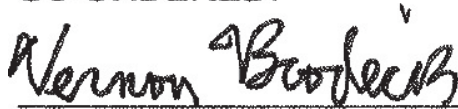
Richard I. Greenberg

cc: All counsel (via ECF)

4867-9182-5959, v. 1

Application DENIED without prejudice. The parties can renew this motion within 30 days of the current deadline for discovery, which is 12/2/2022. The parties need not follow the several deadlines scheduled before 12/2/2022 for specific discovery requests. The post discovery conference previously scheduled for 11/3/2022 is hereby adjourned sine die.

**SO ORDERED:**



July 8, 2022

**HON. VERNON S. BRODERICK  
UNITED STATES DISTRICT JUDGE**